

In the United States District Court
for the District of Massachusetts

UNITED STATES OF AMERICA)
) CR. NO. 04-MJ-01751-CBS
 v.)
)
 GILMARI PADILLA)

Joint Motion to
Continue Hearing and Report Case

The parties hereby move that the hearing presently scheduled for November 24, 2004 be continued on the ground that defendant has indicated her intent to plead guilty. The case will be ready for reporting up to the District Court as soon as the plea agreement is finalized and the original charging district, in Florida, and the local District of Massachusetts have each signed off on the transfer document pursuant to Fed. R. Crim. P. 20. It is expected that these approvals will be obtained within the next two weeks. It is proposed that the hearing be put over to December 22, 2004, with the expectation that the case will be ready for reporting to the District Court on or before that date.

Respectfully submitted,

MICHAEL J. SULLIVAN,
United States Attorney

/s/thomas e. kanwit
THOMAS E. KANWIT
Assistant U.S. Attorney

Assented to:

GILMARI PADILLA, Defendant

/s/ george f. gormley
GEORGE F. GORMLEY, Esquire
Counsel for Defendant